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86 Chambers Street
New York, New York 10007

January 24, 2018

MEMO ENDORSED

BY ECF AND HAND DELIVERY

The Honorable Colleen McMahon
Chief United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1640
New York, NY 10007


Colleen McMahon
1/25/18

Re: Johnson v. Central Intelligence Agency, No. 17 Civ. 1928 (CM) (GWG)

Dear Chief Judge McMahon:

This Office represents Defendant the Central Intelligence Agency (the "CIA") in the above-referenced case brought by Adam Johnson ("Plaintiff"), pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552. I write respectfully pursuant to Part I.D of the Court's Individual Practices and Procedures to request (i) a two-week extension of the briefing schedule set in this matter by the Court in its Order of January 19, 2018 (the "Order"), and (ii) a one-day extension of the deadline to inform the Court of necessary redactions to the Order to protect classified information. This is the CIA's first request for an extension of this briefing schedule and the redaction deadline. Plaintiff consents to this request.

On January 19, 2018, the Court issued the Order directing the Government, *inter alia*, to file supplemental briefing by January 31, 2018, with Plaintiff's response due February 15, 2018. This Office requires additional time to consult with the CIA regarding the issues raised by the Court in its Order. In addition, due to ongoing construction, our access to this Office's secure facilities has been severely restricted, significantly reducing our ability to discuss matters with the CIA and to handle information necessary to draft the brief. Accordingly, the CIA respectfully requests a two-week extension of the briefing schedule such that the Government's brief would be due on February 14, 2018, and Plaintiff's response on March 1, 2018.

Also on January 19, the Government was directed to inform the Court within five business days — *i.e.*, by Friday, January 26 — as to which portions of the Order should be redacted to protect classified information. *See* Docket No. 25. Because of the lapse in appropriations at midnight on January 19, 2018, which continued through January 22, 2018, undersigned counsel and relevant CIA personnel were furloughed and unable to work on this matter. Accordingly, the CIA respectfully requests that the Court permit the CIA to inform the Court of the required redactions on Monday, January 29, 2018.

The Honorable Colleen McMahon

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I thank the Court for its consideration of this request.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney for the
Southern District of New York

By: s/ Anthony J. Sun
ANTHONY J. SUN
Assistant United States Attorney
86 Chambers St., 3rd Floor
New York, New York 10007
(212) 637-2810

cc: Daniel Novack, Esq. (via ECF)
Counsel for Plaintiff